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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PT JAYA SAMUNDRA KARUNIA  
SHIPPING,

08 CV 1891 (JGK)

Plaintiff,

- against -

USL SHIPPING FZE a/k/a USL  
SHIPPING FZE DUBAI, USL SHIPPIN  
FZE DUBAI, USL FZE or UNITED  
SHIPPERS LIMITED,

Defendant.

**NOTICE OF MOTION UNDER RULE E OF THE  
SUPPLEMENTAL RULES FOR CERTAIN  
ADMIRALTY AND MARITIME CLAIMS AND LOCAL  
ADMIRALTY RULE E.1 FOR COUNTERSECURITY**

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law, and Affidavit of Jeremy J.O. Harwood dated April 15, 2008 Defendant, will move this Court before the Hon. John Koeltl, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York for an Order pursuant to Rule E(4)(f) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure ("F.R.Civ.P.") for

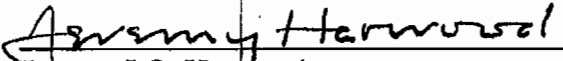
countersecurity and granting such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE THAT**, under Local Rule 6.1(c) of the United States District Courts for the Southern and Eastern Districts of New York and the Court's individual practice rules, oral argument will be heard if so directed by the Court or upon application and that oral argument is so requested.

Date: New York, New York  
April 15, 2008

Respectfully submitted,

BLANK ROME LLP

By:   
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*Attorneys for Defendant*